

Exhibit 2

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

UNIVERSAL CONNECTIVITY
TECHNOLOGIES INC.,

Plaintiff,

Case No. 2:23-cv-00449-JRG

v.

LENOVO GROUP LIMITED.

Defendant.

**DEFENDANT LENOVO GROUP
LIMITED’S OBJECTIONS AND RESPONSES TO
PLAINTIFF’S FIRST SET OF INTERROGATORIES (NOS. 1-10)**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendant Lenovo Group Limited (“LGL”) hereby submits the following Objections and Responses to Plaintiff Universal Connectivity Technologies Inc.’s (“UCT” or “Plaintiff”) First Set of Interrogatories to Defendant LGL (Nos. 1-10) (the “Interrogatories”).

GENERAL STATEMENT

1. LGL’s responses are made solely for the purpose of *Universal Connectivity Technologies Inc. v. Lenovo Group Limited*, Case No. 2:23-cv-00449-JRG, pending in the United States District Court for the Eastern District of Texas (the “Litigation”).

2. LGL is a holding company that does not make, use, offer for sale, sell any products in the United States, nor does it import any products into the United States. Accordingly, LGL does not have possession, custody, or control of information or documents relevant to such

to Interrogatory No. 6, *infra*. LGL also objects to this Interrogatory as unduly burdensome to the extent that it seeks information that is not relevant to any claim or defense in this Litigation, and/or not proportional to the needs of this Litigation. LGL further objects to this Interrogatory as unduly burdensome at least to the extent that it seeks documents or information that are publicly available, that are otherwise equally accessible to Plaintiff, or that are more appropriately sought from other sources or through other means that are more convenient, more efficient, more practical, less burdensome, or less expensive. LGL further objects to this Interrogatory as compound because it consists of multiple distinct Interrogatories.

Subject to, and without waiving any of the foregoing General and Specific objections, LGL responds as follows:

LGL is a holding company that does not make, use, offer for sale, or sell any products in the United States, nor does it import any products into the United States. Accordingly, LGL does not have possession, custody, or control of information or documents relevant to such activities. Publicly available information regarding Lenovo-branded products can be found at <https://psref.lenovo.com> and <https://pcsupport.lenovo.com/us/en>.

LGL's investigation is ongoing and LGL reserves the right to amend or supplement its response to this Interrogatory.

INTERROGATORY NO. 3:

For each of the LGL products identified in response to Interrogatory No. 1, identify the supplier, model name and number for any power delivery controllers used therein that is responsible for the DisplayPort, PCIe, and/or USB functionality. This includes identifying any source code version numbers and dates each product was sold with each identified version of such source code.

RESPONSE TO INTERROGATORY NO. 3:

In addition to its General Objections and its objections to Interrogatory No. 1, which LGL incorporates herein by reference, LGL objects to this Interrogatory as vague, ambiguous, overly

broad, and unduly burdensome to the extent that it seeks information regarding “any power delivery controllers.” LGL further objects to this Interrogatory because at least the terms “power delivery controller,” “model name and number,” “responsible for the ... functionality,” “source code version numbers,” and “sold with each identified version of such source code” are vague and undefined. LGL further objects to this Interrogatory because the phrase “responsible for the ... functionality” improperly shifts the burden to LGL to identify what component or process purportedly practices the claims of the Asserted Patents, as Plaintiff has failed to identify in its Infringement Contentions any particular component as being responsible for the accused functionality. LGL also objects to this Interrogatory to the extent it seeks information that is outside of its possession, custody, or control, particularly to the extent it seeks information about third parties. LGL further objects to this Interrogatory to the extent that it seeks information regarding the “dates each product was sold,” as disclosure of such information would be premature for the reasons explained with respect to Interrogatory No. 6, *infra*. LGL also objects to this Interrogatory as unduly burdensome to the extent that it seeks information that is not relevant to any claim or defense in this Litigation, and/or not proportional to the needs of this Litigation. LGL further objects to this Interrogatory as unduly burdensome at least to the extent that it seeks documents or information that are publicly available, that are otherwise equally accessible to Plaintiff, or that are more appropriately sought from other sources or through other means that are more convenient, more efficient, more practical, less burdensome, or less expensive. LGL further objects to this Interrogatory as compound because it consists of multiple distinct Interrogatories.

Subject to, and without waiving any of the foregoing General and Specific objections, LGL responds as follows:

LGL is a holding company that does not make, use, offer for sale, or sell any products in the United States, nor does it import any products into the United States. Accordingly, LGL does not have possession, custody, or control of information or documents relevant to such activities. Publicly available information regarding Lenovo-branded products can be found at <https://psref.lenovo.com> and <https://pcsupport.lenovo.com/us/en>.

LGL's investigation is ongoing and LGL reserves the right to amend or supplement its response to this Interrogatory.

INTERROGATORY NO. 4:

For each of the LGL products identified in response to Interrogatory No. 1, identify the supplier, model name and number for any embedded controllers used therein that is responsible for the DisplayPort, PCIe, and/or USB functionality. This includes identifying any source code version numbers and dates each product was sold with each identified version of such source code.

RESPONSE TO INTERROGATORY NO. 4:

In addition to its General Objections and its objections to Interrogatory No. 1, which LGL incorporates herein by reference, LGL objects to this Interrogatory as vague, ambiguous, overly broad, and unduly burdensome to the extent that it seeks information regarding "any embedded controllers." LGL further objects to this Interrogatory because at least the terms "embedded controller," "model name and number," "responsible for the ... functionality," "source code version numbers," and "sold with each identified version of such source code" are vague and undefined. LGL further objects to this Interrogatory because the phrase "responsible for the ... functionality" improperly shifts the burden to LGL to identify what component or process purportedly practices the claims of the Asserted Patents, as Plaintiff has failed to identify in its Infringement Contentions any particular component as being responsible for the accused functionality. LGL also objects to this Interrogatory to the extent it seeks information that is outside of its possession, custody, or control, particularly to the extent it seeks information about

Dated: July 29, 2024

Respectfully Submitted,

/s/ Stephen Marshall

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